

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TELENOR EAST INVEST AS,	:	
	:	
Plaintiff,	:	ECF Case
	:	
- against -	:	07 Civ. 4829 (DC)
	:	
ALTIMO HOLDINGS & INVESTMENTS	:	
LIMITED, ECO TELECOM LIMITED, CTF	:	
HOLDINGS LIMITED, CROWN FINANCE	:	
FOUNDATION and RIGHTMARCH LIMITED,	:	
	:	
Defendants.	:	
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**NOTICE OF MOTION TO DISMISS,
OR IN THE ALTERNATIVE, TO COMPEL ARBITRATION**

PLEASE TAKE NOTICE, that upon the accompanying declaration of Gonzalo S. Zeballos, the exhibits thereto, and the accompanying memorandum of law, Eco Telecom Limited (“Eco Telecom”) and CTF Holdings Limited (“CTF”), by their attorneys Lovells LLP, shall move this Court, before the Honorable Denny Chin, United States District Judge, at the Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 11A, for an order dismissing the Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(6) and 9(b) and the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(b)(1), or in the alternative, compelling arbitration of the claims

brought against them by Telenor East Invest AS.

Dated: New York, New York
August 27, 2007

LOVELLS LLP

By: /s/ Edward T. Schorr
Edward T. Schorr (ES-0290)
Hillel I. Parness (HP-1638)
Gonzalo S. Zeballos (GZ-5994)

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*Attorneys for Eco Telecom Limited and CTF
Holdings Limited*